DISTRICT OF NEW JERSEY	
In re:	Chapter 11
LTL MANAGEMENT LLC,	Case No. 21-30589 (MBK)
Debto	Honorable Michael B. Kaplan r.

UNITED STATES BANKRUPTCY COURT

## DECLARATION OF KENNETH R. FEINBERG FOR APPOINTMENT AS COURT EXPERT

- I, Kenneth R. Feinberg, declare pursuant to 28 U.S.C. §1746, under penalty of perjury, that:
  - 1. On July 28, 2022, the Honorable Michael B. Kaplan, Bankruptcy Judge, entered an order on the Court's own motion, identifying me as the proposed Courtappointed expert ("Expert") under Rule 706 of the Federal Rules of Evidence. I respectfully submit this Declaration pursuant to that Order.
  - 2. If appointed, I anticipate an extensive and intensive series of separate confidential meetings with all interested participants, as well as my own professionals who will assist me, as an essential component of an intense, focused effort to finalize my conclusions and prepare a Final Report consistent with the Court's Order of Appointment. I would provide a full and fair opportunity for all interested parties, and their experts, to be part of this process. My task is to prepare and file a Rule

706 report that estimates the volume and value of current and future ovarian and mesothelioma claims relating to the Case, whether arising in the United States or Canada.

- 3. My negotiated fee, to be paid by the Debtor, will be \$500,000 per month, plus reasonable disbursements. The Debtor has agreed to this flat monthly fee. As my work progresses, I will employ professionals to assist me. Specific budgets will be provided for each retained professional and their fees will be included in my invoice as pass -through expenses.
- 4. I am an attorney in good standing in New York (1971), District of Columbia (1977) and Massachusetts (1980) and have been admitted by the Federal Courts in these respective jurisdictions as well as in the United States Courts of Appeals for the Second Circuit and District of Columbia. I am the sole lawyer of The Law Offices of Kenneth R. Feinberg, PC.
- 5. For most of my professional career, I have served as a mediator, arbitrator, claims administrator and/or Court-appointed special master in an effort to resolve complex disputes. As such, I have not acted as an advocate representing any particular party. Instead, I am a neutral without a client. In all of these disputes, I have acted as a facilitator to help the parties bridge differences among themselves and their experts.
- 6. I am currently the Court-appointed mediator in both the Imerys Talc and Cyprus

  Mines talc bankruptcy in Delaware and the Hess/Honx asbestos bankruptcy in

Texas. In addition, I am currently serving as a voluntary mediator in the Georgia Pacific/Bestwall bankruptcy in North Carolina. I acted as a co-mediator in the successful Owens Illinois/Paddock asbestos bankruptcy in North Carolina. recently served as the Court-appointed mediator in the successful Purdue and Mallinckrodt opioid bankruptcies in the Southern District of New York and Delaware. In none of these mediations, and other cases, have I been asked to get involved in issues concerning Johnson & Johnson or LTL. In fact, in the Imerys Talc and Cypress Mines cases, I have been expressly asked not to get involved in any J&J or LTL issues, and I have not done so. Thus, there has not been any discussion or focus on J&J/LTL issues, including insurance coverage. No J&J subjects have ever been raised or discussed. At no time in the mediation did I receive as mediator any information – confidential or otherwise – pertaining to the estimated volume or value of individual Imerys Cyprus or J&J tort claims. And so far as insurance is concerned, the sole subject of the Imerys Cyprus mediation focuses on available insurance coverage pursuant to past and present insurance policies, and certainly not the estimated volume or value of individual tort claims.

- 7. J&J/LTL issues have likewise not been part of any of my previous mediation assignments.
- 8. I understand that my duty here is to the Court, and not to any particular party.

  Nor am I to act as a mediator in the J&J/LTL bankruptcy. My role here is expressly limited to my assignment as a Court-appointed, Rule 706 Estimation Expert.

- 9. I have reviewed the attached "LTL Management LLC Potentially Interested Parties (as of April 29, 2022)" list and "Schedule of Potentially Interested Parties (entered 11/23/21) " list. Both lists were provided at my request by the Debtor and are attached as Exhibit A. To the best of my knowledge, I have no connection to the Debtor, its creditors, any other potential party in interest set forth therein, or any person employed in the Office of the Unites States Trustee for Region 3. I point out, however, that during my professional career spanning over four decades acting as a mediator, arbitrator, claims administrator or Court-appointed special master, I have been involved in numerous complex disputes with many of the lawyers, law firms, companies and public officials referenced in these attached lists. In all such cases - with the exceptions noted below in this paragraph - I acted as a neutral and was not retained by any of these lawyers or companies referenced in the two lists. I also note the following:
  - In my work as the Administrator of programs implemented for the
    resolution of various cases of sexual abuse of minors for various Catholic
    Church dioceses, I have retained the services of FTI Consulting, Inc. to assist
    me with administrative and technical tasks.
  - Bank of America, N.A. is my personal and law firm banker.
  - I have obtained personal insurance from Chubb Insurance Company.

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• In the course of the Lehman bankruptcy in the Southern District of New

York, I was the Court-appointed fee examiner working with the parties and

the US Bankruptcy Trustee.

• In 2007 I was appointed Distribution Agent of *In Re: United States* 

Securities and Exchange Commission v. American International Group, Inc.

by the US District Court for the Southern District of New York, responsible

for the design and implementation of a Plan for the distribution of a \$800

million Fund to eligible claimants.

10. In the event that additional information becomes available that reveals any

connections with parties in interest, this Declaration will be amended or

supplemented.

11. I do not believe that serving as a Court-appointed Expert in this matter will result

in a conflict of interest with any of the disclosures referenced in this Affidavit.

12. Finally, in connection with my work as a Court-appointed Expert, it is my express

understanding that I may be deposed by any party, may be called to testify by the

Court or any party, and may be cross-examined by any party in connection with

my anticipated Final Estimation Report.

Kenneth R. Feinberg

Kamith R. Famley

August 10, 2022

#### **EXHIBIT A**

### LTL Management LLC Potentially Interested Parties (as of April 29, 2022)

### <u>Professionals Retained and Proposed to be Retained by Debtor</u>

Blake, Cassels & Graydon LLP Hogan Lovells Orrick Herrington & Sutcliffe LLP Skadden, Arps, Slate, Meager & Flom LLP

#### **Debtor's Ordinary Course Professionals**

Sills Cummis & Gross P.C.

### <u>The United States Trustee – Region 3 – District of New Jersey</u>

Andrew R. Vara

# Professionals Retained and Proposed to be Retained by Official Committee of Talc Claimants

FTI Consulting, Inc.
Gilbert LLP
Houlihan Lokey Capital, Inc.
Miller Thomson LLP
Monzack Mersky and Browder P.A.
Sherman, Silverstein, Kohl, Rose
& Podolsky, P.A.
The Brattle Group

# Members of the Official Committee of Talc Claimants and the Law Firms that Represent Them

Alishia Landrum April Fair Blue Cross Blue Shield of Massachusetts Darlene Evans Hill Hill Carter Franco Cole & Black, PC Kellie Brewer Kristie Doyle, as Estate Representative of Dan Doyle Levin, Papantonio, Rafferty Proctor, Buchaman, O'Brien, Barr, Mougey, P.A. Patricia Cook Randy Derouen Rebecca Love Tonya Whetsel, as Estate Representative of Brandon Whetsel

William A. Henry, as Estate Representative of Debra Henry

# The Future Talc Claimants Representative and Retained Professionals

Randi S. Ellis Walsh Pizzi O'Reilly Falanga LLP

### The Fee Examiner and Retained Professionals

Bernstein, Shur, Sawyer & Nelson, P.A. Robert J. Keach Traurig Law LLC

#### **Co-Mediators**

Gary Russo Joel Schneider

#### Member States of Ad Hoc Committee of States Holding Consumer Protection Claims

Alabama Alaska Arkansas Arizona Colorado Connecticut, Delaware Florida Hawaii Idaho Illinois Iowa Kansas Kentucky Maine Maryland Massachusetts Michigan, Minnesota Mississippi Montana Nebraska Nevada New Hampshire

New Jersey

#### 

New York North Carolina, North Dakota Ohio Oklahoma Oregon Rhode Island South Dakota Texas Utah Vermont Virginia Washington Washington, D.C. West Virginia Wisconsin

#### Counsel to Ad Hoc Committee of States Holding Consumer Protection

Womble Bond Dickinson (US) LLP

### Parties to Pending Appeals and Their Counsel

Arnold & Itkin LLP Aylstock, Witkin, Kreis & Overholtz PLLC KTBS Law LLP Offit Kurman P.A. Pachulski Stang Ziehl & Jones Bailey Glasser LLP Brandi Carl Brown Rudnick LLP Cooley LLP Cooney & Conway Dean Omar Branham Shirley LLP Evan Plotkin Genova Burns LLC Giovanni Sosa Golomb Spirit Grunfeld Jan Deborah Michelson-Boyle Karst & von Oiste LLP Katherine Tollefson Kazan, McClain, Satterley & Greenwood Kristie Doyle as Estate Representative of Dan Dovle Levy Konigsberg LLP Lex Nova Law LLC Massey & Gail LLP

Maune Raichle Hartley French & Mudd, LLC
Motley Rice
Otterbourg P.C.
Parkins Lee & Rubio LLP
Patricia Cook
Randy Derouen
Sherman Silverstein Kohl Rose &
Podolsky, P.A.
Shirleeta Ellison
Tonya Whetsel as Estate Representative of
Brandon Whetsel
Waldrep Wall Babcock & Bailey PLLC
Weitz & Luxenberg, P.C.

#### <u>Certain Law Professors Filing Amici</u> Briefs

Bruce Markell
Diane Dick
Erwin Chemerinsky
J. Marie Glover
Jared Ellias
Kenneth Ayotte
Robert K. Rasmussen
Susan Block-Lieb
Yesha Yaday

#### Bankruptcy Rule 2002 Appearances<sup>1</sup>

ACE Property and Casualty Insurance Company (f/k/a CIGNA Property & Casualty Insurance Company) AIG Europe S.A. (as successor in interest to Union Atlantique d'Assurances S.A) AIG Property Casualty Company (f/k/a Birmingham Fire Insurance Company of Pennsylvania) **AIU Insurance Company** Allianz Global risk Ü.S. Insurance Company (f/k/a/ Allianz Insurance Company and Fireman's Fund Insurance Company Allianz Global Risk US Insurance Company, formerly known as Allianz Insurance Company Allstate Insurance Company, solely as

successor in interest to Northbrook

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Where a Bankruptcy Rule 2002 appearance was filed by counsel on behalf of clients, the clients have been listed herein to the extent identified and where certain clients have not been identified, the filing counsel is listed, to the extent not otherwise listed herein.

#### SCHEDULE 1

Schedule of Potentially Interested Parties

#### LTL Management LLC **Potentially Interested Parties** (entered 11/23/21)

**Debtor** AMO Groningen B.V.

**AMO International Holdings** 

LTL Management LLC AMO Ireland

AMO Ireland Finance Unlimited Company

**Direct Equity Owner of Debtor** AMO Italy SRL AMO Japan K.K.

Johnson and Johnson Consumer Inc. AMO Manufacturing Spain S.L. AMO Manufacturing USA, LLC

**Debtor's Direct Non-Debtor Subsidiary** AMO Netherlands BV

AMO Nominee Holdings, LLC

Royalty A&M LLC AMO Norway AS

AMO Puerto Rico Manufacturing, Inc. **Other Non-Debtor Affiliates** 

AMO Sales and Service, Inc. AMO Singapore Pte. Ltd. 3Dintegrated ApS AMO Spain Holdings, LLC Acclarent, Inc. AMO Switzerland GmbH Actelion Ltd AMO U.K. Holdings, LLC Actelion Manufacturing GmbH

AMO United Kingdom, Ltd. Actelion Pharmaceuticals Australia

AMO Uppsala AB Pty. Limited

AMO US Holdings, Inc. Actelion Pharmaceuticals Korea Ltd. AMO USA Sales Holdings, Inc.

Actelion Pharmaceuticals Ltd AMO USA, LLC

Actelion Pharmaceuticals Mexico Animas Diabetes Care, LLC

S.A. De C.V. Animas LLC

Actelion Pharmaceuticals Trading Animas Technologies LLC

(Shanghai) Co., Ltd. AorTx, Inc.

Actelion Pharmaceuticals UK Limited **Apsis** Actelion Pharmaceuticals US, Inc. Aragon Pharmaceuticals, Inc.

Actelion Registration Limited

Actelion Treasury Unlimited Company

Atrionix, Inc. Akros Medical, Inc. AUB Holdings LLC Albany Street LLC Auris Health, Inc. **ALZA** Corporation

Backsvalan 2 Aktiebolag Alza Land Management, Inc. Backsvalan 6 Handelsbolag AMO (Hangzhou) Co., Ltd.

Beijing Dabao Cosmetics Co., Ltd. AMO (Shanghai) Medical Devices

Asia Pacific Holdings, LLC

BeneVir BioPharm, Inc. Trading Co., Ltd. Berna Rhein B.V. AMO ASIA LIMITED

BioMedical Enterprises, Inc. AMO Australia Pty Limited Biosense Webster (Israel) Ltd. AMO Canada Company

Biosense Webster, Inc. AMO Denmark ApS

C Consumer Products Denmark ApS AMO Development, LLC Calibra Medical LLC

AMO France Campus-Foyer Apotheke GmbH AMO Germany GmbH

Carlo Erba OTC S.r.l. Centocor Biologics, LLC

Centocor Research & Development, Inc.

ChromaGenics B.V.

Ci:Labo Customer Marketing Co., Ltd.

Ci:z. Labo Co., Ltd.

Cilag AG

Cilag GmbH International

Cilag Holding AG

Cilag Holding Treasury Unlimited Company

Cilag-Biotech, S.L.

CNA Development GmbH

Codman & Shurtleff, Inc.

Coherex Medical, Inc.

ColBar LifeScience Ltd.

Company Store.com, Inc.

Cordis de Mexico, S.A. de C.V.

Cordis International Corporation

Corimmun GmbH

CoTherix Inc.

CSATS, Inc.

Darlain Trading S.A.

Debs-Vogue Corporation

(Proprietary) Limited

DePuy France

DePuy Hellas SA

DePuy International Limited

DePuy Ireland Unlimited Company

DePuy Mexico, S.A. de C.V.

DePuy Mitek, LLC

DePuy Orthopaedics, Inc.

DePuy Products, Inc.

DePuy Spine, LLC

DePuy Synthes Gorgan Limited

DePuy Synthes Institute, LLC

DePuy Synthes Leto SARL

DePuy Synthes Products, Inc.

DePuy Synthes Sales, Inc.

DePuy Synthes, Inc.

Dr. Ci:Labo Co., Ltd.

DR. CI:LABO COMPANY LIMITED

**Dutch Holding LLC** 

ECL7, LLC

EES Holdings de Mexico,

S. de R.L. de C.V.

EES, S.A. de C.V.

EIT Emerging Implant Technologies GmbH

Ethicon Biosurgery Ireland

Ethicon Endo-Surgery (Europe) GmbH

Ethicon Endo-Surgery, Inc.

Ethicon Endo-Surgery, LLC

Ethicon Holding Sarl

**Ethicon Ireland Unlimited Company** 

Ethicon LLC

Ethicon PR Holdings Unlimited Company

Ethicon Sarl

Ethicon US, LLC

Ethicon Women's Health & Urology Sarl

Ethicon, Inc.

Ethnor (Proprietary) Limited

Ethnor del Istmo S.A.

Ethnor Farmaceutica, S.A.

Ethnor Guatemala, Sociedad Anomina

Finsbury (Development) Limited

Finsbury (Instruments) Limited

Finsbury Medical Limited

Finsbury Orthopaedics International Limited

Finsbury Orthopaedics Limited

FMS Future Medical System SA

GH Biotech Holdings Limited

Global Investment Participation B.V.

GMED Healthcare BV

Guangzhou Bioseal Biotech Co., Ltd.

Hansen Medical Deutschland GmbH

Hansen Medical International, Inc.

Hansen Medical UK Limited

Hansen Medical, Inc.

Healthcare Services (Shanghai) Ltd.

I.D. Acquisition Corp.

Innomedic Gesellschaft für innovative

Medizintechnik und Informatik mbH

Innovalens B.V.

Innovative Surgical Solutions, LLC

J & J Company West Africa Limited

J&J Pension Trustees Limited

J.C. General Services BV

Janssen Alzheimer Immunotherapy

(Holding) Limited

Janssen Biologics (Ireland) Limited

Janssen Biologics B.V.

Janssen BioPharma, Inc.

Janssen Biotech, Inc.

Janssen Cilag Farmaceutica S.A.

Janssen Cilag S.p.A. Janssen Cilag SPA

Janssen Cilag, C.A.

Janssen de Mexico, S. de R.L. de C.V.

Janssen Development Finance

Unlimited Company

Janssen Diagnostics, LLC

Janssen Egypt LLC

Janssen Farmaceutica Portugal Lda

Janssen Global Services, LLC

Janssen Group Holdings Limited

Janssen Holding GmbH

Janssen Inc.

Janssen Irish Finance Company UC

Janssen Korea Ltd.

Janssen Oncology, Inc.

Janssen Ortho LLC

Janssen Pharmaceutica

(Proprietary) Limited

Janssen Pharmaceutica NV

Janssen Pharmaceutica S.A.

Janssen Pharmaceutical

Janssen Pharmaceutical K.K.

Janssen Pharmaceutical Sciences

**Unlimited Company** 

Janssen Pharmaceuticals, Inc.

Janssen Products, LP

Janssen R&D Ireland

Janssen Research & Development, LLC

Janssen Sciences Ireland

Unlimited Company

Janssen Scientific Affairs, LLC

Janssen Supply Group, LLC

Janssen Vaccines & Prevention B.V.

Janssen Vaccines Corp.

Janssen-Cilag

Janssen-Cilag (New Zealand) Limited

Janssen-Cilag A/S

Janssen-Cilag AG

Janssen-Cilag Aktiebolag

Janssen-Cilag AS

Janssen-Cilag B.V.

Janssen-Cilag de Mexico S. de R.L. de C.V.

Janssen-Cilag Farmaceutica Lda.

Janssen-Cilag Farmaceutica Ltda.

Janssen-Cilag GmbH

Janssen-Cilag International NV

Janssen-Cilag Kft.

Janssen-Cilag Limited

Janssen-Cilag Limited

Janssen-Cilag Manufacturing, LLC

Janssen-Cilag NV

Janssen-Cilag OY

Janssen-Cilag Pharma GmbH

Janssen-Cilag Pharmaceutical S.A.C.I.

Janssen-Cilag Polska, Sp. z o.o.

Janssen-Cilag Pty Ltd

Janssen-Cilag S.A.

Janssen-Cilag s.r.o.

Janssen-Cilag, S.A.

Janssen-Cilag, S.A. de C.V.

Janssen-Pharma, S.L.

J-C Health Care Ltd.

Jevco Holding, Inc.

JJ Surgical Vision Spain, S.L.

JJC Acquisition Company B.V.

JJHC, LLC

JJSV Belgium BV

JJSV Manufacturing Malaysia SDN. BHD.

JJSV Norden AB

JJSV Produtos Oticos Ltda.

JNJ Global Business Services s.r.o.

JNJ Holding EMEA B.V.

JNJ International Investment LLC

JNJ Irish Investments ULC

Johnson & Johnson

Johnson & Johnson - Societa' Per Azioni

Johnson & Johnson (Angola), Limitada

Johnson & Johnson (China) Investment Ltd.

Johnson & Johnson (Egypt) S.A.E.

Johnson & Johnson (Hong Kong) Limited

Johnson & Johnson (Ireland) Limited

Johnson & Johnson (Jamaica) Limited

Johnson & Johnson (Kenya) Limited

Johnson & Johnson (Middle East) Inc.

Johnson & Johnson (Mozambique),

Limitada

Johnson & Johnson (Namibia)

(Proprietary) Limited

Johnson & Johnson (New Zealand) Limited

Johnson & Johnson (Philippines), Inc.

Johnson & Johnson (Private) Limited Johnson & Johnson (Thailand) Ltd. Johnson & Johnson (Trinidad) Limited Johnson & Johnson (Vietnam) Co., Ltd Johnson & Johnson AB Johnson & Johnson AG Johnson & Johnson Belgium Finance Company BV Johnson & Johnson Bulgaria EOOD Johnson & Johnson China Ltd. Johnson & Johnson Consumer (Hong Kong) Limited Johnson & Johnson Consumer (Thailand) Limited Johnson & Johnson Consumer B.V. Johnson & Johnson Consumer **Holdings France** Johnson & Johnson Consumer Inc. Johnson & Johnson Consumer NV Johnson & Johnson Consumer Saudi Arabia Limited Johnson & Johnson Consumer Services EAME Ltd. Johnson & Johnson d.o.o. Johnson & Johnson de Argentina S.A.C. e. I. Johnson & Johnson de Chile Limitada Johnson & Johnson de Chile S.A. Johnson & Johnson de Colombia S.A. Johnson & Johnson de Costa Rica, S.A. Johnson & Johnson de Mexico, S.A. de C.V. Johnson & Johnson de Uruguay S.A. Johnson & Johnson de Venezuela, S.A. Johnson & Johnson del Ecuador, S.A. Johnson & Johnson Del Paraguay, S.A. Johnson & Johnson del Peru S.A. Johnson & Johnson do Brasil Industria E Comercio de Produtos Para Saude Ltda. Johnson & Johnson Dominicana, S.A.S. Johnson & Johnson Enterprise Innovation Inc. Johnson & Johnson European

Treasury Company

Johnson & Johnson Finance Corporation

Johnson & Johnson Finance Limited

Services GmbH Johnson & Johnson for Export and Import LLC Johnson & Johnson Foundation Scotland (NON-PROFIT) Johnson & Johnson Gateway, LLC Johnson & Johnson Gesellschaft m.b.H. Johnson & Johnson GmbH Johnson & Johnson Guatemala, S.A. Johnson & Johnson Health and Wellness Solutions, Inc. Johnson & Johnson Health Care Systems Inc. Johnson & Johnson Hellas Commercial and Industrial S.A. Johnson & Johnson Hellas Consumer Products Commercial Societe Anonyme Johnson & Johnson Hemisferica S.A. Johnson & Johnson Holding GmbH Johnson & Johnson Holdings K.K. Johnson & Johnson Inc. Johnson & Johnson Industrial Ltda. Johnson & Johnson Innovation - JJDC, Inc. Johnson & Johnson Innovation Limited Johnson & Johnson Innovation LLC Johnson & Johnson International Johnson & Johnson International (Singapore) Pte. Ltd. Johnson & Johnson International Financial Services Company Johnson & Johnson Japan Inc. Johnson & Johnson K.K. Johnson & Johnson Kft. Johnson & Johnson Korea Ltd. Johnson & Johnson Korea Selling & Distribution LLC Johnson & Johnson Limitada Johnson & Johnson Limited Johnson & Johnson LLC Johnson & Johnson Luxembourg Finance Company Sarl Johnson & Johnson Management Limited Johnson & Johnson Medical (China) Ltd. Johnson & Johnson Medical (Proprietary) Ltd

Johnson & Johnson Financial

Johnson & Johnson Medical (Shanghai) Ltd.

Johnson & Johnson Medical (Suzhou) Ltd.

Johnson & Johnson Medical B.V.

Johnson & Johnson Medical Devices &

Diagnostics Group - Latin America, L.L.C.

Johnson & Johnson Medical GmbH

Johnson & Johnson Medical Korea Ltd.

Johnson & Johnson Medical Limited

Johnson & Johnson Medical Mexico, S.A. de C.V.

Johnson & Johnson Medical NV

Johnson & Johnson Medical

Products GmbH

Johnson & Johnson Medical Pty Ltd

Johnson & Johnson Medical S.A.

Johnson & Johnson Medical S.p.A.

Johnson & Johnson Medical SAS

Johnson & Johnson Medical

Saudi Arabia Limited

Johnson & Johnson Medical Servicios

Profesionales S. de R.L. de C.V.

Johnson & Johnson Medical Taiwan Ltd.

Johnson & Johnson Medical, S.C.S.

Johnson & Johnson Medikal Sanayi ve

Ticaret Limited Sirketi

Johnson & Johnson Middle East FZ-LLC

Johnson & Johnson Morocco

Societe Anonyme

Johnson & Johnson Nordic AB

Johnson & Johnson Pacific Pty Limited

Johnson & Johnson Pakistan

(Private) Limited

Johnson & Johnson Panama, S.A.

Johnson & Johnson Personal Care

(Chile) S.A.

Johnson & Johnson Poland Sp. z o.o.

Johnson & Johnson Private Limited

Johnson & Johnson Pte. Ltd.

Johnson & Johnson Pty. Limited

Johnson & Johnson Research Pty Ltd

Johnson & Johnson Romania S.R.L.

Johnson & Johnson S.E. d.o.o.

Johnson & Johnson S.E., Inc.

Johnson & Johnson Sante Beaute France

Johnson & Johnson SDN, BHD,

Johnson & Johnson Services, Inc.

Johnson & Johnson Servicios Corporativos,

S. de R.L. de C.V.

Johnson & Johnson Surgical Vision India

Private Limited

Johnson & Johnson Surgical Vision, Inc.

Johnson & Johnson Taiwan Ltd.

Johnson & Johnson UK Treasury

Company Limited

Johnson & Johnson Ukraine LLC

Johnson & Johnson Urban Renewal

Associates

Johnson & Johnson Vision Care

(Shanghai) Ltd.

Johnson & Johnson Vision Care Ireland

**Unlimited Company** 

Johnson & Johnson Vision Care, Inc.

Johnson & Johnson, S.A.

Johnson & Johnson, S.A. de C.V.

Johnson & Johnson, s.r.o.

Johnson & Johnson, s.r.o.

Johnson and Johnson (Proprietary) Limited

Johnson and Johnson Sihhi Malzeme Sanayi

Ve Ticaret Limited Sirketi

JOM Pharmaceutical Services, Inc.

La Concha Land Investment Corporation

Latam International Investment Company

**Unlimited Company** 

Lifescan

McNeil AB

McNeil Consumer Pharmaceuticals Co.

McNeil Denmark ApS

McNeil Healthcare (Ireland) Limited

McNeil Healthcare (UK) Limited

McNeil Healthcare LLC

McNeil Iberica S.L.U.

McNeil LA LLC

McNEIL MMP, LLC

McNeil Nutritionals, LLC

McNeil Panama, LLC

McNeil Products Limited

McNeil Sweden AB

MDS Co. Ltd.

Medical Device Business Services, Inc.

Medical Devices & Diagnostics Global

Services, LLC

Medical Devices International LLC

Medical Industrial do Brasil Ltda.

Medos International Sarl

Medos Sarl

MegaDyne Medical Products, Inc.

Menlo Care De Mexico, S.A. de C.V.

Mentor B.V.

Mentor Deutschland GmbH

Mentor Medical Systems B.V.

Mentor Partnership Holding

Company I, LLC

Mentor Texas GP LLC

Mentor Texas L.P.

Mentor Worldwide LLC

Micrus Endovascular LLC

Middlesex Assurance Company Limited

Momenta Ireland Limited

Momenta Pharmaceuticals, Inc.

NeoStrata Company, Inc.

NeoStrata UG (haftungsbeschränkt)

Netherlands Holding Company

Neuravi Inc.

Neuravi Limited

NeuWave Medical, Inc.

Novira Therapeutics, LLC

NuVera Medical, Inc.

Obtech Medical Mexico, S.A. de C.V.

**OBTECH Medical Sarl** 

OGX Beauty AU Pty Ltd

**OGX** Beauty Limited

**OMJ Holding GmbH** 

OMJ Ireland Unlimited Company

OMJ Pharmaceuticals, Inc.

Omrix Biopharmaceuticals Ltd.

Omrix Biopharmaceuticals NV

Omrix Biopharmaceuticals, Inc.

Ortho Biologics LLC

Ortho Biotech Holding LLC

Ortho-McNeil Pharmaceutical, LLC

Orthotaxy

Patriot Pharmaceuticals, LLC

Peninsula Pharmaceuticals, LLC

Penta Pty. Limited

Percivia LLC

Perouse Plastie

Pharmadirect Ltd.

Pharmedica Laboratories (Proprietary)

Limited

PMC Holdings G.K.

Princeton Laboratories, Inc.

Productos de Cuidado Personal y de La

Salud de Bolivia S.R.L.

Proleader S.A.

PT Integrated Healthcare Indonesia

PT. Johnson & Johnson Indonesia

Pulsar Vascular, Inc.

Regency Urban Renewal Associates

RespiVert Ltd.

RoC International

Rutan Realty LLC

Scios LLC

Sedona Enterprise Co., Ltd.

Sedona Singapore International Pte. Ltd.

Sedona Thai International Co., Ltd.

Serhum S.A. de C.V.

Shanghai Elsker For Mother & Baby

Co., Ltd

Shanghai Johnson & Johnson Ltd.

Shanghai Johnson & Johnson

Pharmaceuticals Ltd.

Sightbox, LLC

Sodiac ESV

Spectrum Vision Limited Liability Company

Spectrum Vision Limited Liability Company

Spectrum Vision Limited Liability

Partnership

Spine Solutions GmbH

SterilMed, Inc.

Sterilmed, Inc.

Surgical Process Institute Deutschland

GmhH

Synthes Costa Rica S.C.R., Limitada

SYNTHES GmbH

Synthes GmbH

Synthes Holding AG

Synthes Holding Limited

SYNTHES Medical Immobilien GmbH

Synthes Medical Surgical Equipment &

Instruments Trading LLC

Synthes Produktions GmbH

Synthes Proprietary Limited

Synthes S.M.P., S. de R.L. de C.V.

Synthes Tuttlingen GmbH Synthes USA Products, LLC Synthes USA, LLC Synthes, Inc. TARIS Biomedical LLC TearScience, Inc. The Anspach Effort, LLC The Vision Care Institute, LLC Tibotec, LLC Torax Medical, Inc. TriStrata, Incorporated UAB "Johnson & Johnson" Vania Expansion Verb Surgical Inc. Vision Care Finance Unlimited Company Vogue International LLC Vogue International Trading, Inc. WH4110 Development Company, L.L.C. Xian Janssen Pharmaceutical Ltd. XO1 Limited Zarbee's, Inc.

#### Managers and Officers of the Debtor

John Kim Richard Dickinson Robert Wuesthoff Russell Deyo

#### Major Current Business Affiliations of Debtor's Managers

American Foundation for Opioid
Alternatives
Lawyers for Civil Justice
Migration Policy Institute
Miller Center for Community Protection &
Reliance, Eagleton Institute of Politics,
Rutgers University
National Center for State Courts
National Council, McLean Hospital
New Jersey Civil Justice Institute
One Mind

#### **Depository and Disbursement Banks**

Bank of America, N.A.

#### **Major Sureties**

Chubb
Federal Insurance Company
Liberty Mutual Insurance Company
Travelers Casualty and Surety Company of
America

### Parties to Material Contracts with the Debtor

Johnson & Johnson Consumer Inc. Johnson & Johnson Services, Inc. U.S. Bank N.A.

#### Significant Co-Defendants in Talc-Related Litigation

3M Company A.O. Smith Corporation Albertsons Companies, Inc. Avon Products, Inc. Barretts Minerals, Inc. **BASF Catalysts LLC** Block Drug Company, Inc. Borg Warner Morse Tec, Inc. Brenntag North America Brenntag Specialties, Inc. Bristol-Myers Squibb Company Carrier Corporation Chanel, Inc. Charles B. Chrystal Co., Inc. Chattem, Inc. Colgate-Palmolive Company Conopco Inc. Costco Wholesale Corporation Coty, Inc. Crane Co. **CVS** Health Corporation CVS Pharmacy, Inc. Cyprus Amax Minerals Company Cyprus Mines Corporation Dana Companies, LLC DAP Products, Inc. **Dollar General Corporation** Duane Reade Inc.

**Eaton Corporation** 

Eli Lilly and Company

Elizabeth Arden, Inc.

Estee Lauder Inc.

Family Dollar Stores Inc.

Flowserve US, Inc.

**FMC** Corporation

Food 4 Less of California, Inc.

Ford Motor Company

Foster Wheeler, LLC

Gardner Denver, Inc.

General Electric Company

Genuine Parts Company

Goodyear Tire & Rubber Co.

Goulds Pumps, LLC

Grinnell LLC

Honeywell International, Inc.

Imerys Talc America, Inc.

Imerys USA, Inc.

IMO Industries Inc.

John Crane, Inc.

K&B Louisiana Corporation

Kaiser Gypsum Company, Inc.

**Kmart Corporation** 

Kolmar Laboratories

Longs Drug Stores California

L'Oreal USA, Inc.

Lucky Stores, Inc.

Macy's, Inc.

Mary Kay Inc.

Maybelline LLC

Metropolitan Life Insurance Company

**Noxell Corporation** 

Personal Care Products Council

Pfizer, Inc.

Pharma Tech Industries, Inc.

Pneumo Abex, LLC

PTI Royston, LLC

Publix Super Markets, Inc.

R.T. Vanderbilt Holding Company, Inc.

Ralphs Grocery Company

Revlon Consumer Products Corporation

Revlon, Inc.

Rite Aid Corporation

Safeway, Inc.

Sanofi-Aventis U.S. LLC

Shulton, Inc.

Specialty Minerals Inc.

Target Corporation

The Dow Chemical Company

The Estee Lauder Companies, Inc.

The Kroger Co.

The Procter & Gamble Company

Thrifty Payless, Inc.

Unilever Home & Personal Care USA

Union Carbide Corporation

Vanderbilt Minerals, LLC

ViacomCBS, Inc.

Walgreen Co.

Walmart, Inc.

Warren Pumps, LLC

Whittaker Clark & Daniels, Inc.

Wyeth Holdings LLC

Yves Saint Laurent America, Inc.

#### <u>Debtors' Retained Professionals and</u> <u>Claims Agent</u>

AlixPartners LLP

Bates White LLC

Epiq Corporate Restructuring LLC

Jones Day

King & Spalding LLP

McCarter & English, LLP

Rayburn Cooper & Durham, P.A.

Shook, Hardy & Bacon L.L.P.

Weil Gotshal & Manges LLP

### <u>Professionals, Consultants, and Service</u> <u>Providers</u>

Adler Pollock & Sheehan PC

Bailey Glasser LLP

Barnes & Thornburg, LLP

Barrasso Usdin Kupperman

Freeman & Sarver, L.L.C.

Blake, Cassels & Graydon LLP

Blank Rome LLP

Brown Greer PLC

**Butler Snow LLP** 

Carlton Fields, P.A.

Chehardy, Sherman, Williams, Recile, & Hayes Covington & Burling LLP Damon Key Leong Kupchak Hastert Davis Hatley Haffeman & Tighe Dechert LLP Elliott Law Offices, PA Faegre Drinker Biddle & Reath LLP Foliart, Huff, Ottaway & Bottom Gibson, Dunn & Crutcher LLP Goldman Ismail Tomaselli Brennan & Baum Hartline Barger HeplerBroom LLC Irwin Fritchie Urquhart & Moore LLC Johnson & Bell Ltd. Jones, Skelton & Hochuli, P.L.C. Kaplan, Johnson, Abate & Bird LLP Kelley Jasons McGowan Spinelli Hanna & Reber, LLP Kirkland & Ellis LLP Kitch Drutchas Wagner Valitutti & Sherbrook Lewis Brisbois Bisgaard & Smith, LLP Manion Gaynor & Manning LLP Miles & Stockbridge Milligan & Herns Morgan Lewis Nelson Mullins Riley & Scarborough, LLP Nutter McClennen & Fish LLP Orrick, Herrington, & Sutcliffe, LLP Patterson Belknap Webb & Tyler LLP Proskauer Rose LLP Quattlebaum, Grooms & Tull PLLC Schnader Harrison Segal & Lewis Schwabe Williamson & Wyatt Sidley Austin LLP Skadden, Arps, Slate, Meager & Flom LLP Stoel Rives LLP Sullivan Whitehead & Deluca LLP Swartz Campbell LLC The Weinhardt Law Firm Tucker Ellis LLP Willcox & Savage, P.C.

#### Known Professionals for Certain Non-Debtor Parties in Interest

Cravath, Swaine & Moore White & Case LLP

#### **Material Potentially Indemnified Parties**

Bausch Health Companies Inc. Cyprus Mines Corporation Cyprus Talc Corp. Imerys Talc America, Inc. Imerys Talc Vermont, Inc. Luzenac America, Inc. Pharma Tech Industries, Inc. PTI Royston, LLC Rio Tinto America, Inc. RTZ America, Inc. Valeant Pharmaceuticals International, Inc. Windsor Minerals Inc. Costco Wholesale Corporation Publix Super Markets, Inc. Rite Aid Corporation Safeway Inc. Walmart Inc.

#### Law Firms with Significant Representations of Talc Claimants

Arnold & Itkin LLP Ashcraft & Gerel, LLP Aylstock, Witkin, Kreis & Overholtz, PLLC Barnes Firm Beasley Allen Law Firm Cellino Law LLP Dalimonte Rueb Stoller, LLP Dean Omar Branham Shirley, LLP Driscoll Firm, LLC Fears Nachawati Law Firm Ferraro Law Firm Flint Law Firm LLC Golomb Spirit Grunfeld, P.C. Honik LLC Johnson Law Group Karst & von Oiste LLP Kazan, McClain, Satterly & Greenwood PLC

Lanier Law Firm
Levy Konigsberg LLP
Maune Raichle Hartley French &
Mudd, LLC
Miller Firm, LLC
Motley Rice LLC
Napoli Shkolnik PLLC
OnderLaw, LLC
Simmons Hanly Conroy LLC
Simon Greenstone Panatiere
Bartlett, PC
The Gori Law Firm
Trammell PC
Weitz & Luxenberg, P.C.
Williams Hart Law Firm

## Key Parties in *Imerys Talc America*, *Inc.* and *Cyprus Mines Corp. Chapter 11 Cases*

Cyprus Amax Minerals Company
Cyprus Mines Corporation
Cyprus Talc Corporation
Imerys S.A.
Imerys Talc America, Inc.
Imerys Talc Vermont, Inc.
(fka Windsor Minerals Inc.)
James L. Patton
Luzenac America, Inc.
Official Committee of Tort Claimants
(In re Imerys Talc America, Inc.)
Official Committee of Tort Claimants
(In re Cyprus Mines Corp.)
Roger Frankel

#### **Debtor's Insurers**

A.G. Securitas
ACE Property & Casualty Insurance
Company
Aetna Casualty and Surety Company
Affiliated FM Ins. Company
AIG Europe S.A.
AIG Property and Casualty Company
AIU Ins. Company
Allianz Ins. Company

Allianz Global Risks US Insurance Company Allstate Insurance Company American Centennial Ins. Company American Motorists Ins. Company American Re-Insurance Company Arrowood Indemnity Company ASR Schadeverzekering N.V. Assurances Generales De France Assurantiekantoor VanWijk & Co. Atlanta International Insurance Company Birmingham Fire Ins. Company of Pennsylvania Central National Ins. Company of Omaha Century Indemnity Company Champion Dyeing Allocation Year Chubb City Ins. Company Colonia Versicherungs AG, Koln Continental Insurance Company Darag Deutsche Versicherungs-Und Rückversicherungs-AG Drake Ins. Company of New York Employers Ins. Company of Wausau Employers Ins. of Wausau **Employers Mutual Casualty Company** Eurinco Allgemeine Versicherungs AG, Dusseldorf **Everest Reinsurance Company** Fireman's Fund Ins. Company First State Ins. Company GAP Gibraltar Casualty Company Granite State Ins. Company Great American Great Northern Ins. Company Great Southwest Fire Ins. Company Groupe Drouot Harbor Ins. Company Hartford Accident and Indemnity Company Home Ins. Company Ideal Mutual Ins. Company **Industrial Indemnity Company** Ins. Company of North America Ins. Company of the State of Pennsylvania

Ins. Corporation of Singapore Limited

Integrity Ins. Company
International Ins. Company
International Surplus Lines Ins. Company
Lexington Ins. Company
London Guarantee and Accident
Company of N.Y.
L'Union Atlantique S.A. d'Assurances
Mead Reinsurance Corporation

Middlesex Assurance Company
Middlend Ing. Company

Midland Ins. Company

Midstates Reinsurance Corp.

Mission Ins. Company

Mission National Ins. Company Munich Reinsurance America, Inc.

Mutual Fire, Marine, & Inland Ins.

Company

N.V. De Ark

N.V. Rotterdamse Assurantiekas

N.V. Schadeverzekeringsmaatschappij Maas Lloyd

National Casualty Company

National Union Fire Ins. Company of Pittsburgh, PA

Nationwide

New Hampshire Ins. Company

North River Ins. Company

Northbrook Excess and Surplus

Ins. Company

Northeastern Fire Ins. Company

of Pennsylvania

Pacific Employers Ins. Company

**ProSight** 

Prudential Reinsurance Company

Puritan Insurance Company

Republic Indemnity Company of America

Republic Ins. Company

Republic Western Ins. Company

Repwest Insurance Company

Resolute Management Inc.

Rheinland Versicherungen

Rheinland Verzekeringen

Riverstone Insurers

Royal Belge I.R., S.A. d'Assurances

Royal Indemnity Company

Royal Ins. Company

Safety Mutual Casualty Corporation

Safety National Casualty Corporation Seguros La Republica SA Sentry Insurance A Mutual Company Southern American Ins. Company Starr Indemnity & Liability Company **TIG Insurance Company** Transamerica Premier Insurance Company Transit Casualty Company Travelers Casualty and Surety Company UAP Union Atlantique d'Assurances S.A. Union Indemnity Ins. Company of New York Westchester Fire Insurance Company Westport Insurance Corporation XL Ins. Company

# Employees of the Bankruptcy Administrator's Office for the Western District of North Carolina

Alexandria Kenny Anne Whitley David Shepherd Katrina Adams Sarah Scholz Shelley K. Abel

#### Bankruptcy Judges for the Western District of North Carolina

Judge George Hodges Judge J. Craig Whitley Judge Laura T. Beyer

#### Bankruptcy Rule 2002 Appearances<sup>1</sup>

AIG Europe S.A. (as successor in interest to Union Atlantique d'Assurances S.A)

AIG Property Casualty Company (f/k/a Birmingham Fire Insurance Company of Pennsylvania)

AIU Insurance Company

Wanda Allen

Allstate Insurance Company, as successor in interest to Northbrook Excess & Surplus Insurance Company, formerly Northbrook Insurance Company

Atlanta International Insurance Company (as successor in interest to Drake Insurance Company)

Arnold & Itkin LLP

ASR Schadeverzekering N.V. (as successor in interest to Assurantiekoor Van Wijk & Co.)

Aylstock, Witkin, Kreis & Overholtz, PLLC Barnes Law Group

Bausch Health Americas, Inc. f/k/a Valeant Pharmaceuticals International

Bausch Health Companies Inc. f/k/a Valeant Pharmaceuticals International, Inc.

Bausch Health US, LLC f/k/a Valeant Pharmaceuticals North America LLC

Bestwall LLC

Blue Cross Blue Shield Association

Blue Cross Blue Shield of Massachusetts,

Inc

Edna Brown

Barbara Busch

Beatriz Cabeza

Monica Cambron

Tarshwa Carter

**Bridget Coates** 

Cohen, Placitella & Roth P.C.

Lillian Cohn-Sharon

The Continental Insurance Company

Elaine Cook

Cyprus Amax Minerals Company

Cyprus Mines Corporation

Gloria Davis

Dawn Dispensa

Patricia Dunbar

Fears Nachawati PLLC

Ann Frye-Moragne

Debra Fugiel

Victoria Gomes

Granite State Insurance Company

Andrea Harris

Charlette Hein

Tabitha Henry

Christine Hodge

Darlene Holland

Imerys Talc America, Inc.

Imerys Talc Canada Inc.

Imerys Talc Vermont, Inc.

The Insurance Company of the State of

Pennsylvania

Johnson & Johnson

Johnson & Johnson Consumer Inc.

Voncile Jones

Amanda Joyce

Kazan, McClain, Satterley &

Greenwood, PLLC

Shelly King

Mildred Kirk-Brown

Julie Lamore

Susan Leach

Mary Leinen

Levy Konigsberg LLP

Lexington Insurance Company

Jo Ellen Luster

Nancy Lyman

Massey & Gail LLP

Bernadette McGinnis

Pamela Morrill

National Union Fire Insurance Company of

Pittsburgh, Pa.

New Hampshire Insurance Company

The North River Insurance Company

N.V. Schadeverzekeringsmaatschappij Maas

Lloyd (individually and as successor in

Where a Bankruptcy Rule 2002 appearance was filed by counsel on behalf of clients, the clients have been listed herein to the extent identified and where certain clients have not been identified, the filing counsel is listed, to the extent not otherwise listed herein.

interest to policies subscribed in favor of Johnson & Johnson by N.V. Rotterdamse Assurantiekas, n/k/a De Ark)

Kathleen O'Halloran

Lisa O'Neal

OnderLaw, LLC

The Plaintiffs Steering Committee in the In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Precuts Liability Multi-District Litigation

RheinLand Versicherungen (as successor in interest only to the subscriptions of the former Dutch company Rheinland Verzekeringen)

Rio Tinto America Inc.

Cora Robinson

Robinson Calcagnie, Inc.

Lisa Sabatine

Maraldine Schmidt

Valerie Schultz

Isabel Spano

Starr Indemnity & Liability Company (as successor in interest to Republic Insurance Company)

State of Texas, Attorney General of Texas

Three Crowns Insurance Company

**Christine Torres** 

Travelers Casualty and Surety Company (f/k/a The Aetna Casualty and Surety Company)

May Virata

Waldrep Wall Babcock & Bailey PLLC Westchester Fire Insurance Company Sharon Wildman Oshunna Williams

## LTL Management LLC Additional Potentially Interested Parties

#### **Debtor's Retained Professionals**

Wollmuth Maher & Deutsch, LLP

#### Employees of the Office of the United States Trustee – Region 3 – District of New Jersey

Adela Alfaro

Kirsten K. Ardelean

Francyne D. Arendas

Michael Artis

Lauren Bielskie

Peter J. D'Auria

**Neidy Fuentes** 

David Gerardi

Rosemarie Giles

Tia Green

Mitchell B. Hausman

Martha Hildebrandt

Joseph C. Kern

Daniel C. Kropiewnicki

Maggie McGee

Alexandria Nikolinos

Tina L. Oppelt

Angeliza Ortiz-Ng

Robert J. Schneider, Jr.

Jeffrey Sponder

Fran B. Steele

James Stives

William J. Ziemer

## Bankruptcy Judges for the District of New Jersey

Judge Andrew B. Altenburg, Jr. Judge Christine M. Gravelle Judge Jerrold N. Poslusny, Jr. Judge John K. Sherwood Judge Kathryn C. Ferguson

Judge Michael B. Kaplan Judge Rosemary Gambardella Judge Stacey L. Meisel Judge Vincent F. Papalia

## Professionals Retained by Official Committee of Talc Claimants

Bailey & Glasser LLP Brown Rudnick LLP Genova Burns LLC Massey & Gail LLP Otterbourg P.C. Parkins Lee & Rubio LLP

#### Bankruptcy Rule 2002 Appearances<sup>1</sup>

ACE Property and Casualty Insurance Company (f/k/a CIGNA Property & Casualty Insurance Company)

Albertsons Companies, Inc.

The Blue Cross Blue Shield Association

Brandi Carl

Central National Insurance Company of

Omaha

Century Indemnity Company

Dean Omar Branham Shirley, LLP

Kristie Lynn Doyle

Employers Ins. Company of Wausau

Employers Ins. of Wausau

**Employers Mutual Casualty Company** 

Federal Insurance Company

Roger Frankel

Great Northern Insurance Company

Imerys SA

Law Firm of Brian W.

Hofmeister, LLC

The Miller Firm, LLC

Motley Rice LLC

Nationwide Indemnity

Where a Bankruptcy Rule 2002 appearance was filed by counsel on behalf of clients, the clients have been listed herein to the extent identified and where certain clients have not been identified, the filing counsel is listed, to the extent not otherwise listed herein.

Pacific Employers Insurance Company Pension Benefit Guaranty Corporation Linda Rabasca Republic Indemnity Company of America Scottsdale Insurance Sue Sommer-Kresse Westchester Fire Insurance Company Williams Hart Boundas Easterby, LLP